REMARKS

At the time of the Final Office Action dated December 6, 2004, claims 1-20 were pending and rejected in this application.

CLAIMS 1-20 ARE REJECTED UNDER 35 U.S.C. § 102 AS BEING ANTICIPATED BY BERTRAND, U.S. PATENT NO. 5,552,989

In the statement of the rejection, the Examiner referred particularly to Fig. 3 of Bertrand, asserting the disclosure of a graphics drawing device corresponds to that claimed. This rejection is respectfully traversed.

In the Amendment filed August 3, 2004, Applicants argued that Bertrand fails to identify all of the claimed limitations recited in independent claims 1 and 11. In comparing the present Office Action to the prior Office Action, Applicants note that the Examiner has referred to additional citations within Bertrand. Also, with regard to the *Response to Arguments* found on pages 5 and 6 of the Office Action, Applicants note that the Examiner stated that "various components and interaction between components of the central processor taught by Bertrand anticipate the subject invention."

Notwithstanding the Examiner's additional comments in the statement of the rejection, Applicants' review of pages 2 and 3 of the statement of the rejection does not yield any clear and specific identification by the Examiner as to those features in Bertrand that identically disclose all of the claimed features. Put differently, based upon the Examiner's statement of the rejection,

Applicants cannot specifically identify those features in Bertrand that the Examiner alleges identically disclose the claimed processor, the claimed geometrical arithmetic unit, and the claimed drawing unit. Furthermore, Applicants have been unable to identify from the Examiner's rejection where Bertrand identically discloses the claimed interactions between these above-identified features.

Based upon the Examiner's comments in the statement of the rejection, Applicants speculate that the Examiner may believe that the claimed invention is directed solely to a drawing device in which non-rotating target drawing data is not rotated by a processor, whereas rotating target drawing data is rotated by the processor. If this interpretation is correct, Applicants submit that Examiner has overlooked that the claimed geometrical arithmetic unit, which transfers display coordinate data to either the processor or a drawing unit depending on the type of target drawing data (i.e., rotating or non-rotating) such that the rotation target drawing data takes a different path than the non-rotation target drawing data. As illustrated in Fig. 2 (see also step 54 in Fig. 3), rotation target drawing data proceeds from the geometrical arithmetic unit 5 to the drawing unit 6 and then to the drawing memory 7, whereas non-rotation target drawing data proceeds from the geometrical arithmetic unit 5 to the processor 4 and then to the drawing memory 7. As a result of this claimed feature, processing on the target drawing data can be performed in parallel, which increases drawing process speed (see the paragraph spanning pages 7 and 8 of Applicants' disclosure).

The feature described above (i.e., the target drawing data taking different paths depending upon whether the data is non-rotation or rotation), is recited in independent claim 1 as follows:

> transferring the display coordinate data to the drawing unit when the drawing data is the rotation target drawing data, and
>
> transferring the display coordinate data to said processor when said drawing data is the non-rotation target drawing data.

Independent claim 11 recites that two different images, one image containing rotation target drawing data and the other image containing non-rotation target drawing data, are transferred to a drawing memory. These particular features, which are not disclosed by Bertrand, are recited in independent claim 1 as follows:

> transferring said rotated image to said drawing memory based on said display coordinate data when said drawing data is the rotation target drawing data, and
>
> transferring an image corresponding to said non-rotation target drawing data to said drawing memory based on said display coordinate data when said drawing data is the non-rotation target drawing data.

Since the Examiner has failed to establish that Bertrand teaches all of the claimed limitations, Applicant submits that Bertrand fails to identically describe the claimed invention within the meaning of 35 U.S.C. § 102. Applicants, therefore, respectfully solicit withdrawal of the imposed rejection of claims 1-20 under 35 U.S.C. § 102 for anticipation based upon Bertrand.

Applicants have made every effort to present claims which distinguish over the prior art, and it is believed that all claims are in condition for allowance. However, Applicants invite the Examiner to call the undersigned if it is believed that a telephonic interview would expedite the prosecution of the application to an allowance. Accordingly, and in view of the foregoing remarks, Applicants hereby respectfully request reconsideration and prompt allowance of the pending claims.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417, and please credit any excess fees to such deposit account.

Respectfully submitted,

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